

JJD/MRM:ADR

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(18 U.S.C. § 111(a)(1))

ROBERT WILSON,

Case No. 22 MJ 864

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

PAUL BRUNHUBER, being duly sworn, deposes and states that he is a Deputy United States Marshal with the United States Marshals Service (“USMS”), duly appointed according to law and acting as such.

Assault of a Federal Officer

On or about August 11, 2022, within the Eastern District of New York, the defendant ROBERT WILSON did forcibly assault, resist, oppose, impede, intimidate and interfere with one or more officers and employees of the United States, to wit: three Court Security Officers (“CSOs”) at the United States District Court for the Eastern District of New York in Central Islip, New York (“CSO-1,” “CSO-2” and “CSO-3”), whose identities are known to your deponent, while such officers were engaged in the performance of official duties, which assault involved physical contact with the officers.

(Title 18, United States Code, Section 111(a)(1))

The source of your deponent's information and the grounds for his beliefs are as follows:¹

1. I am a Deputy United States Marshal with USMS and have been involved in the investigation of numerous cases involving assaults. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

2. On or about August 10, 2022, the defendant ROBERT WILSON entered the United States Federal Courthouse for the Eastern District of New York in Central Islip, New York (the "Courthouse") at approximately 10:15 a.m. and proceeded to the office of the Clerk of Court to file documents in connection with a litigation before a sitting United States District Judge in the Eastern District of New York (the "District Judge"). While at that office, WILSON stated, in sum and substance and in part, that if "the judge" did not "follow the rules," WILSON would return with "armed troops" in order to "arrest the judge for treason." Since in or about May 2022, WILSON has made similar statements to Courthouse staff and to another judge, both in person and in letters. As a result, Courthouse CSOs had been instructed to monitor WILSON's activities in the Courthouse.

3. On or about August 11, 2022, the defendant ROBERT WILSON returned to the Courthouse at approximately 10:15 a.m. As he proceeded through the security checkpoint located at the main entrance of the Courthouse, he asked the CSOs

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

stationed there, in sum and substance and in part, where the District Judge's "office" was. The CSOs responded that he was not permitted to see the District Judge at that time. WILSON proceeded to the elevator bank. Consistent with the protocol previously established with respect to WILSON, CSO-1 escorted WILSON during this time. WILSON took an elevator to the fourth floor of the Courthouse, briefly remained on that floor, and then returned to the elevator with CSO-1 continuing to follow him.

4. Once the elevator doors closed, the defendant ROBERT WILSON attacked CSO-1 by grabbing the back of his neck, forcing him to the ground, and punching him several times in the side ribcage area. The elevator then arrived at the seventh floor of the Courthouse and CSO-1 made a distress call on his radio. Several CSOs arrived at the seventh floor elevator bank, including CSO-2 and CSO-3, and attempted to detain WILSON. WILSON physically resisted those efforts, resulting in injuries to CSO-2 and CSO-3. CSOs were ultimately able to detain WILSON and he was taken into custody. CSO-1, CSO-2 and CSO-3 were taken to the hospital so that their injuries could be assessed.

5. CSO-1, CSO-2 and CSO-3, who were deputized by the USMS as Courthouse Security Officers, at all times relevant to the complaint, were engaged in the performance of their official duties.

WHEREFORE, your deponent respectfully requests that the defendant
ROBERT WILSON be dealt with according to law.



PAUL BRUNHUBER
Deputy United States Marshal
United States Marshals Service

Sworn to me before this
11 th day of August, 2022


THE HONORABLE ARLENE R. LINDSAY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK